

October 21, 2021

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

**Re: Lifeline and Linkup Reform Modernization, WC Docket 11-42**

Dear Ms. Dortch:

On October 20, 2021, I spoke via telephone with Ramesh Nagarajan, Acting Legal Advisor, Wireline to Acting Chairwoman Rosenworcel to discuss the pending request of National Association of State Utility Consumer Advocates' (NASUCA)<sup>1</sup> that the Commission reconsider proceeding with the phase down of Lifeline support for standalone voice service as adopted in the *2016 Lifeline Order*.<sup>2</sup> Absent action by the Commission, the phase down is due to take place on December 1, 2021. Consistent with our earlier advocacy,<sup>3</sup> I indicated USTelecom's support for a pause of the phase down and emphasized the need for immediate action on the petition so that providers have certainty about whether there will, or will not, be a pause in the phase down sufficiently in advance of the phase down taking effect.

Sincerely,

//s//Patrick R. Halley

Patrick Halley  
Senior Vice President, Policy & Advocacy and  
General Counsel

cc: Ramesh Nagarajan

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<sup>1</sup> Petition of NASUCA for Reconsideration, WC Docket No. 11-42 (June 23, 2016).

<sup>2</sup> *Id.*, citing, *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3987, para. 66 (2016) (*2016 Lifeline Order*).

<sup>3</sup> Reply Comments of USTelecom – The Broadband Association, WC Docket No. 11-42 (Aug. 17, 2021).